

UNITED STATES DISTRICT COURT

for the

WESTERN District of TEXAS

United States of America

v.

David Isaac Jr.

Case No. SA-21-MJ-01433

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 21, 2021 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon In Possession of a Firearm

18 U.S.C. § 922(j)

Possession of Stolen Firearm.

Penalties: Up to 10 Years Imprisonment, \$250,000 Fine, 3 Years
 Supervised Release, \$100 Mandatory Special Assessment

This criminal complaint is based on these facts:

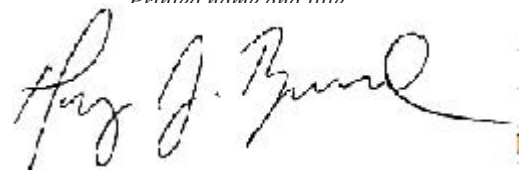
See attached affidavit

☒ Continued on the attached sheet.HEATHER PLUMMER Digitally signed by HEATHER PLUMMER
Date: 2021.12.22 09:56:54 -06'00'*Complainant's signature*

Heather Plummer / SA ATF

Printed name and title

- ☐ Sworn to before me and signed in my presence.
☒ Sworn to telephonically and signed electronically.

Date: December 22, 2021City and state: San Antonio, Texas

Judge's signature

Henry J. Bemporad, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Heather Plummer, being duly sworn do hereby depose and state:

1. Your affiant is currently employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives and has been so employed since September 2020. Since September 2020, your affiant has participated in investigations concerning violations of Title 18.
2. On December 21, 2021, San Antonio Police Department Detectives were conducting surveillance on multiple wanted individuals with active warrants. Mobile surveillance was conducted on a Gold Chevrolet Silverado with two occupants with active warrants, **David Isaac Jr.** and a second male subject. Detectives observed the individuals enter the listed vehicle and then drive to a restaurant on the 2800 block of Culebra Rd. San Antonio, TX. The individuals exited the vehicle and entered the restaurant. SAPD Detectives followed Isaac Jr. and the second male subject inside the restaurant.
3. Once inside, SAPD Detectives located and arrested Isaac Jr. and the second wanted male subject for their outstanding warrants. During his arrest, Isaac Jr. advised officers that he had a firearm on his person. SAPD Detectives recovered a Ruger, SR1911, .45 caliber pistol, serial number: 672-05403 from Isaac Jr.'s waistband. The firearm was loaded with eight rounds of .45 caliber ammunition in the magazine and had been stolen from a vehicle at the 100 block of SW Loop 410 San Antonio, TX about three to six hours earlier.
4. An SAPD Detective read Isaac Jr. his Miranda Warnings, which he stated he understood and acknowledged. Isaac Jr. claimed that he purchased the firearm in his possession from an unknown Hispanic male at a carwash near Hillcrest and Bandera for \$125 cash earlier the same day. Isaac Jr. stated that he knew the firearm was stolen because he bought it from an unknown male and for an extremely low price for the current market value. Isaac Jr. stated that he knows he is a felon who cannot possess firearms.
5. An ATF Interstate Nexus examination of the Ruger, SR1911, .45 caliber pistol, serial number: 672-05403, reveals that it was not manufactured in the State of Texas, and therefore traveled in interstate and foreign commerce.
6. Isaac Jr is a convicted felon. He was previously convicted of Aggravated Assault with a Deadly Weapon on September 17, 2019, in Bexar County, Texas, in cause number 2018CR13253. Isaac Jr is a documented gang member of the Bloods (Piru) and 40' Gang by Bexar County Sheriff's Office (TXGANG).

Based on the above facts, your affiant believes that there is probable cause that **David Isaac Jr.**

committed the offenses of felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1), and possession of a stolen firearm, in violation of 18 U.S.C. § 922(j).

HEATHER
PLUMMER

Digitally signed by HEATHER
PLUMMER
Date: 2021.12.22 09:57:43 -06'00'

Special Agent Heather Plummer
Bureau of Alcohol, Tobacco, Firearms, and
Explosives

SUBSCRIBED AND SWORN TO ME THIS 22nd DAY OF December 2021.



HONORABLE JUDGE HENRY J. BEMPORAD
UNITED STATES MAGISTRATE JUDGE